

1 STEVEN T. JAFFE, ESQ.

2 Nevada Bar No. 7035

3 sjaffe@lawhjc.com

4 RICHARD A. ENGLEMANN, ESQ.

5 Nevada Bar No. 6965

6 renglemann@lawhjc.com

7 **HALL JAFFE & CLAYTON, LLP**

8 7425 Peak Drive

9 Las Vegas, Nevada 89128

10 (702) 316-4111

11 Fax (702) 316-4114

12 *Attorneys for Third-Party Defendant*

13 *MATTHIAS HORCH*

14 **UNITED STATES DISTRICT COURT**

15 **DISTRICT OF NEVADA**

16 SHAUN GOODRICH, an individual,

17 Plaintiff,

18 vs.

19 GRG ENTERPRISES, LLC, a Montana
20 Limited Liability Company doing business as
MACKENZIE RIVER; CALLVILLE BAY
RESORT & MARINE, a Nevada Entity;
FOREVER RESORTS LLC, an Arizona
Limited Liability Company; DOES I-X
unknown persons; and ROE Corporation I-X

21 Defendants

22

CALLVILLE BAY RESORT & MARINA;
and FOREVER RESORTS, LLC,

23 Third-Party Claimants,

24 vs.

25 MATTHIAS HORCH,

26 Third-Party Defendant.

27

AND ALL RELATED CROSS-ACTIONS

28 Plaintiff SHAUN GOODRICH, by and through is attorneys of record, and
Defendants/Third-Party Plaintiffs CALLVILLE BAY RESORT & MARINA; and FOREVER

CASE NO. 2:20-CV-00671-JCM-NJK

STIPULATION AND ORDER TO
VACATE HEARING AND TRIAL
DATES AND ORDER SETTING
STATUS CHECK REGARDING
CLOSING DOCUMENTS

1 SAO
 2 2:20-CV-00671-JCM-NJK

3 RESORTS, LLC., and Third-Party Defendant MATTHIAS HORCH, by and through their
 4 attorneys of record, hereby submit this joint stipulation and order to vacate all hearing dates,
 5 trial dates and to set a status check regarding closing documents; accordingly,

6 IT IS HEREBY STIPULATED AND AGREED that this matter resolved between all
 7 parties and all hearing dates, including motions for summary judgment, can be vacated; and

8 IT IS FURTHER STIPULATED that the Court set a Date and Time for a Status Check
 9 regarding the Closing documents, in no less than 45 days.

10 **IT IS SO STIPULATED.**

DATED the 22 nd day of February 2022 HALL JAFFE & CLAYTON, LLP <i>/s/ Richard A. Englemann, Esq.</i> RICHARD A. ENGLEMANN, ESQ. Nevada Bar No. 6965 7425 Peak Drive Las Vegas, Nevada 89128 <i>Attorneys for Third-Party Defendant</i> <i>Matthias Horch</i>	DATED the 22 nd day of February 2022 RYAN ALEXANDER, CHTD. <i>/s/ Ryan Alexander, Esq.</i> RYAN ALEXANDER, CHTD. Nevada Bar No. 10845 3017 West Charleston Boulevard, Suite 10 Las Vegas, NV 89102 <i>Attorney for Plaintiff</i> <i>SHAUN GOODRICH</i>
DATED the 22 nd day of February 2022 GIBSON ROBB & LINDH LLP <i>/s/ Marker E. Lovell, Jr., Esq.</i> MARKER E. LOVELL, JR., ESQ. Admitted Pro Hac Vice 1255 Powell Street Emeryville, CA 94608 <i>Attorneys for Defendant/Third-Party</i> <i>Defendants</i> <i>CALLVILLE BAY RESORT & MARINA</i> <i>and FOREVER RESORTS, LLC</i>	DATED the 22 nd day of February 2022 BROWNE GREEN, LLC <i>/s/ Jared P. Green, Esq.</i> JARED P. GREEN, ESQ. Nevada Bar No. 10059 3755 Breakthrough Way, Ste. 210 Las Vegas, NV 89135 <i>Attorneys for Defendant/Third-Party</i> <i>Defendants</i> <i>CALLVILLE BAY RESORT & MARINA</i> <i>and FOREVER RESORTS, LLC</i>

1 SAO
2 2:20-CV-00671-JCM-NJK

3 **ORDER**

4 Based on the foregoing STIPULATION OF THE PARTIES,

5 IT IS HEREBY ORDERED that all hearing dates, including motions for summary
6 judgment, are vacated; and

7 IT IS FURTHER ORDERED that a Status Report regarding the Closing Documents
8 is due no later than 45 days from the date of this order.

9
10 Dated: February 18, 2022.
11 
12 UNITED STATES DISTRICT JUDGE

13 Submitted by:

14 **HALL JAFFE & CLAYTON, LLP**

15 /s/ *Richard A. Englemann, Esq.*

16 RICHARD A. ENGLEMANN, ESQ.
17 Nevada Bar No. 6965
18 7425 Peak Drive
19 Las Vegas, Nevada 89128
Attorneys for Third Party Defendant
Matthias Horch

Shayna Ortega-Rose

From: Jared Green <jared@bgtriallawyers.com>
Sent: Friday, February 18, 2022 8:40 AM
To: Shayna Ortega-Rose; Richard Englemann; Marker Lovell
Cc: ryan@ryanalexander.us; Noah Cicero; Shayna Ortega-Rose; Erika Parker
Subject: Re: SAO to vacate hearing dates. Goodrich v. Callville Bay and Callville Bay v. Horch

Yes.

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From: Shayna Ortega-Rose <srose@lawhjc.com>
Sent: Friday, February 18, 2022 8:38:36 AM
To: Richard Englemann <Renglemann@lawhjc.com>; Marker Lovell <mlovell@gibsonrobb.com>; Jared Green <jared@bgtriallawyers.com>
Cc: ryan@ryanalexander.us <ryan@ryanalexander.us>; Noah Cicero <Ncicero@lawhjc.com>; Shayna Ortega-Rose <srose@lawhjc.com>; Erika Parker <eparker@lawhjc.com>
Subject: RE: SAO to vacate hearing dates. Goodrich v. Callville Bay and Callville Bay v. Horch

Thank you, Mr. Lovell and Mr. Alexander for approval for e-signature on the attached.

Mr. Green do I have approval for your e-signature on the attached?

Thank you.

Shayna Ortega-Rose | Legal Assistant
Richard A. Englemann, Esq.
Jan K. Tomasik, Esq.



7425 Peak Drive
Las Vegas, NV 89128
Phone: 702.316.4111 x119
Fax: 702.316.4114
Email: srose@lawhjc.com

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From: Richard Englemann <Renglemann@lawhjc.com>
Sent: Thursday, February 17, 2022 1:50 PM
To: Marker Lovell <mlovell@gibsonrobb.com>; 'Jared@bgtriallawyers.com' <jared@bgtriallawyers.com>
Cc: ryan@ryanalexander.us; Shayna Ortega-Rose <srose@lawhjc.com>; Noah Cicero <Ncicero@lawhjc.com>
Subject: SAO to vacate hearing dates. Goodrich v. Callville Bay and Callville Bay v. Horch

Counsel, because of the motions for summary judgment and to keep the settlement on track, I like submitting a stipulation and order to the court to vacate all the hearing dates and to set the matter for a status check regarding the closing documents.

Please find attached the SAO. Please advise is we have your authorization to add your signature.

Sincerely,

Richard A. Englemann, Esq.

Of Counsel

HALL JAFFE & CLAYTON, LLP



7425 Peak Drive
Las Vegas, NV 89128
Phone: 702.316.4111 x125

Fax: 702.316.4114

Email: Renglemann@lawhjc.com

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Shayna Ortega-Rose

From: Marker Lovell <mlovell@gibsonrobb.com>
Sent: Thursday, February 17, 2022 2:21 PM
To: Richard Englemann; 'Jared@bgtriallawyers.com'
Cc: ryan@ryanalexander.us; Shayna Ortega-Rose; Noah Cicero
Subject: RE: [DKIM Permanent Error] SAO to vacate hearing dates. Goodrich v. Callville Bay and Callville Bay v. Horch

Ok with us.

From: Richard Englemann <Renglemann@lawhjc.com>
Sent: Thursday, February 17, 2022 1:50 PM
To: Marker Lovell <mlovell@gibsonrobb.com>; 'Jared@bgtriallawyers.com' <jared@bgtriallawyers.com>
Cc: ryan@ryanalexander.us; Shayna Ortega-Rose <srose@lawhjc.com>; Noah Cicero <Ncicero@lawhjc.com>
Subject: SAO to vacate hearing dates. Goodrich v. Callville Bay and Callville Bay v. Horch

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Sincerely,

Richard A. Englemann, Esq.

Of Counsel

HALL JAFFE & CLAYTON, LLP



7425 Peak Drive
Las Vegas, NV 89128
Phone: 702.316.4111 x125
Fax: 702.316.4114

Email: Renglemann@lawhjc.com

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Shayna Ortega-Rose

From: Ryan Alexander <ryan@ryanalexander.us>
Sent: Thursday, February 17, 2022 1:59 PM
To: Richard Englemann
Cc: Jared@bgtriallawyers.com; Jennifer Lee; Marker Lovell; Noah Cicero; Shayna Ortega-Rose
Subject: Re: SAO to vacate hearing dates. Goodrich v. Callville Bay and Callville Bay v. Horch

Thank you Richard, you may e sign for me.

Ryan

On Thu, Feb 17, 2022 at 1:50 PM Richard Englemann <Renglemann@lawhjc.com> wrote:

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Please find attached the SAO. Please advise is we have your authorization to add your signature.

Sincerely,

Richard A. Englemann, Esq.

Of Counsel

HALL JAFFE & CLAYTON, LLP



7425 Peak Drive

Las Vegas, NV 89128

Phone: 702.316.4111 x125

Fax: 702.316.4114

Email: Renglemann@lawhjc.com